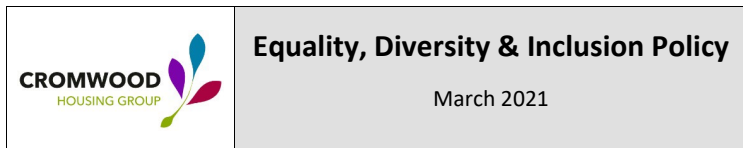


# **EQUALITY DIVERSITY & INCLUSION**



**Policy, Standards & Action Plan 2023**



### **Statement of Intent**

Cromwood is an equal opportunities employer and committed to the equal treatment of all persons throughout all aspects of the organisation, inclusive of recruitment; selection; promotion; termination of employment; and delivery of client services. Our aim is to uphold these principles at all times and treat all people equally, and in accordance with the Equality Act 2010, avoiding direct and/or indirect discrimination. All allegations of harassment and/or victimisation will be thoroughly investigated, and appropriate action taken.

This policy covers all aspects of the organisation inclusive of, but not limited to, vacancy advertising, recruitment, training, and promotion.

### **Records & Monitoring**

To ensure that this policy is operating effectively, and for no other reasons, we collate equality information and conduct analysis of race, gender disability and other protected characteristics.

The ongoing monitoring and analysis of such records provide the basis for appropriate action to eliminate unlawful direct or indirect discrimination and to promote equal opportunities.

### **Application & Implementation**

This policy forms part of our induction training programme and is available to our staff via our internal servers. All employees are fully trained on the policy and any breaches will be dealt with in accordance with our disciplinary procedures.

Consultation on, and communication of this policy is provided to all those who require it, including externally, upon request. Employees are assessed based on their skills, merits, and abilities. We do not discriminate against any person, based on any of the following protected characteristics, or any other:

- Race
- Sex
- Sexual Orientation
- Disability
- Religion and/or beliefs
- Being a transsexual person
- New and expectant mothers
- Age
- Marriage and Civil Partnerships

Any plans for Equality will be included within the company's Objectives & Targets programme. Equality & Diversity is implemented and maintained throughout Cromwood; for each element of the organisation below, we have summarised the key steps in place:

### **Employee (Inclusion, consultation & training)**

This policy, along with the measures to implement it, has been devised because of advice from the relevant bodies as well as in consultation with employee representatives. All employees are appraised periodically, and training needs are identified based on contractual, company and individuals' requirements. Opportunities for training are equally available throughout the organisation, from ad hoc courses to management NVQs. We encourage inclusion and cohesion of staff throughout the organisation and take this into account when placing clients within our accommodation.

#### **Promotion**

Any new vacancies are initially advertised internally, communication of this is sent to ALL staff. If an employee does apply for the role, we will consider the requirements of the new role and consider providing training where gaps exist.

#### **Recruitment & Selection**

Job Adverts are written based on the skills required, application forms do not contain any form of discriminatory questions, and the selection process is undertaken by at least two people within the organisation to ensure an unbiased decision is made. Please see our Recruitment & Selection policy for further details.

#### **Communication**

This policy is displayed within the reception area of our offices and a copy is contained within the company handbook for employee reference as well as maintained on our internal server for all employees.

#### **Legislation**

We will ensure that Cromwood complies fully with the Equality Act 2010 and all other supporting legislation. *The Equality Act 2010 strengthened, summarized, and replaced many previous laws such as the Equal Pay Act 1970, Sex Discrimination Act 1975, Race Relations Act 1976, Sex Discrimination Act 1986, and Disability Discrimination Act 1995.*

#### **Review**

This policy will be reviewed on a regular basis to ensure its compliance with current company ethos, and any applicable changes in law or legislative requirements. Upon review, this policy will be re-communicated to relevant parties along with any advice, guidance, and methods of obtaining additional information and support on the matters concerned.

#### **Management Responsibility**

The Director is responsible for ensuring this policy is implemented and is supported by departmental managers as required. Managers are suitably trained on implementing Equality and diversity throughout the organisation. The Director has signed below to underpin top management commitment to this policy and its implementation.

## Equality, Diversity & Inclusion Standards

Below is a summary of the standards we have adopted which underpin our approach to Equality Diversity & Inclusion.

### 1, Equality, Diversity & Inclusion Training:

All staff employed by Cromwood are required to complete Equality, Diversity training as part of the induction process. This training is mandatory, and staff will not progress through induction unless this is completed.

The training is provided through iHASCO and is part of our online training library. The training comprises of the following:

*This Equality, Diversity & Inclusion training programme looks at how we behave at work and how our behaviour may affect those around us and was created in collaboration with global EDI experts.*

*It addresses unacceptable behaviour, stereotyping, victimisation and discrimination as well as introducing characteristics protected by The Equality Act - suggesting ways in which to build a more supportive, harmonious workplace.*

*An open and inclusive workplace has many benefits - both to the organisation and to individuals; such benefits include an increase in morale, better staff retention, and improved company reputation. By the end of our training staff will feel more confident at addressing sensitive issues surrounding equality, diversity, equity, and inclusion; and we hope they will feel inspired and ready to make a positive difference in their workplace and the wider community.*

The effectiveness and impact of the training will be reviewed as part of the staff survey which is scheduled to be completed later in the year.

We also have an optional training module covering unconscious bias and will look to see if this should be made mandatory following the results of our staff survey.

The training was commissioned 2 years ago and so far, 20 members of staff have undertaken the training when they joined the company, this being a 100% take up as it is mandatory.

### 2, Zero-tolerance approach to all forms of discrimination, harassment and bullying:

Our Anti- Harassment policy states that –

*All employees should treat members of the public, their colleagues, subordinates, and supervisors with respect and courtesy always. On occasions when this does not happen, and this lack of respect persists to make the other person feel intimidated, threatened, or coerced, it is likely that the individual receiving this attention will feel harassed or bullied.*

We operate in accordance with the Equalities Act 2010 and will not tolerate bullying or harassment of any kind including harassment against a 'protected characteristic' or those associated with someone who has a 'protected characteristic'.

**Commented [fk1]:** Can you comment on how this has been working for Cromwood? what the effects have been, what was the baseline from which positive change has happened? what is the take up rate, how many were conducted in each year? what is the content of the training and how was it informed? Was it commissioned, and is it conducted in house? What other buildings blocks are in place, for example policies and procedures that ensure employees comply with EDI legislation?

**Commented [KM2R1]:** Have provided details in text

Legally, harassment is defined as unwelcome physical, verbal or non-verbal conduct and can include (not an exhaustive list):

- Comments about the way a person looks or dresses
- Indecent, racist or offensive remarks
- Questions or comments about the person's life style
- Any conduct which creates an intimidating, hostile, humiliating or degrading environment or violates their dignity.

Such acts are unlawful and have the potential for a legal challenge against both Cromwood and individual members of staff.

The following list contains examples of behaviour where there is the potential for members of staff to follow a case of harassment against the Cromwood at an employment tribunal, or for Cromwood, members of staff or members of the public to bring a case of harassment against an individual member of staff or member of the public in the civil courts:

- Swearing at a colleague or member of the public, or using threatening behaviour
- Making sexist jokes or jokes about people of a certain sexual orientation, people of a certain age, people of an ethnic background, people with an impairment or disability, people observing certain religious practices etc
- Using offensive terms (it is important to be aware what terms some people might find offensive)
- Displaying calendars depicting people (of either gender) in a state of undress.

Cromwood are determined to be very clear in its intent not to tolerate any form of bullying or harassment.

Cromwood regards harassment or bullying by members of staff against other members of staff, or members of the public as most serious breaches of our codes of conduct and will be dealt with in accordance with our disciplinary procedures.

We will take a firm stance against bullying or harassment of employees by members of the public.

We will ensure that staff can voice their concerns about bullying or harassment without fear of reprisal or being victimised.

It is recognised that harassment, bullying or victimisation could occur within the organisation, at any level, irrespective of the working relationships of the staff involved. All complaints by members of staff against other members of staff of bullying, harassment or victimisation will be investigated. If such an investigation reveals that there is likelihood that bullying, harassment or victimisation did occur the charge will be examined in accordance with Cromwoods disciplinary procedure which entitles the alleged victim and the alleged perpetrator to be heard before a decision is taken. Any cases of bullying, harassment or victimisation will most likely result in disciplinary action. Severe cases will be regarded as gross misconduct warranting summary dismissal.

All employees have a responsibility to ensure a safe working environment, particularly managers who should:

- Be responsive and supportive to any member of staff who makes a complaint of bullying, harassment or victimisation
- Maintain confidentiality
- Monitor the situation after the resolution of the complaint.

If staff believe that they have been the victim of harassment, bullying, victimisation, or that they may have witnessed such behaviour, they should discuss the matter with their Manager. Their complaint will be investigated promptly. If, for any reason, the person believes the investigation has not

occurred and concluded within a reasonable period, they can refer the problem to a senior manager or Director.

If a member of the public makes a complaint about bullying or harassment we will deal with the matter in accordance with our Complaints Procedure (Global Procedure 003).

### **3, Recruitment channels encourage applications from diverse and under-represented groups:**

The recruitment, selection and retention of the right people is paramount to the success of Cromwood. Our Employment policy sets out how we ensure that the best people are selected for the role, based on their merits and suitability whilst ensuring the recruitment process is free from any bias or discrimination.

We provide a fair and equal chance for all applicants based on their ability to fulfil the job description, whilst treating all applicants with respect and courtesy to ensure their experience is positive, irrespective of outcome.

We ensure that the channels we use for recruitment are not restrictive and encourages applications from diverse and under represented groups. We don't use trade press or recruitment consultants to avoid any bias that this may produce with trade press often only reaching those who are already in that line of work and recruitment consultants who often rely on personal contacts and connections. We will ensure that the essential job requirements are kept to a minimum to encourage a larger pool of applicants. The channels we use are those where the application process is simplified through they are largely on line but we also use the job centre to ensure a wide distribution.

We will use the audit of our workforce to be carried out later this year to help identify whether we need to make any changes to our existing channels to ensure that the workforce is diverse.

We provide training to all staff to ensure that our policies are being implemented. This is undertaken through our online training portal and the details of the training completed by each member of staff is recorded. We provide additional training to staff who undertake recruitment to ensure they have the skills necessary to undertake fair and unbiased recruitment. This is a one-off online training with refresher being available should this be required,

This policy is operated in conjunction with our Equal Opportunities and Diversity policies. This policy covers activities that form part of the recruitment and selection process and is supported by ongoing monitoring and analysis which is conducted to ensure adherence.

**Commented [fk3]:** This response is more about the recruitment process rather than the assessment and broadening of recruitment channels. Could you have another attempt at this please? Please refer back to the letter dates 20 Feb.

**Commented [KM4R3]:** Have amended text to cover these points

## Equality, Diversity & Inclusion Action Plan 2023

Below is a summary of the Actions agreed under the three GLA themes.

OBJECTIVE	CURRENT POSITION/BASELINE	ACTION/TASK	WHEN	MEASURE OF SUCCESS	
Theme 1: Organisational equality, diversity, and fairness					
1	<b>Have a good understanding of the profile of our workforce</b>	Although details are recorded at the time of recruitment for everyone these have not been pulled together to give a complete picture of the staff profile.	<b>1.1 Audit of existing workforce:</b> An audit of existing staff is being undertaken to identify the current profile of staff employed. These results are to be reported to the board to consider and to agree any actions which would improve diversity and equality.	July 2023	Audit carried out and results included in report
		As above	<b>1.2 Undertake a gender and ethnicity pay review:</b> Once the audit is complete then the pay of each member of staff will be highlighted and grouped into the protected categories. Due to the size of the organisation the results will not be published as it would be easy to identify individual staff. Instead, it will be a confidential for the board to consider and to benchmark this against of similar organisations.	Aug 2023	Pay review carried out and results included in report to board
2	<b>Take positive actions to promote equality and</b>	Currently use various channels to recruit staff but not reviewed whether this helps to promote diversity and	<b>2.1 Report prepared to board highlighting the results of the staff audit and pay</b>	Oct 2023	Report presented to board and any actions identified have been implemented and

	<b>diversity within the workforce</b>	equality within the workforce.	<b>review:</b> This will help to identify if the current recruitment process needs to change to help improve equality and diversity		continue to be reviewed.
			<b>2.2 Actions implemented to ensure effective recruitment:</b> The report presented to board will highlight the actions to be taken to ensure that we encourage applications from diverse and underrepresented groups.	On going	Action plan has been implemented and can report on recruitment and staff profile as part of annual report.
3	<b>Regularly seek the views of staff and use the results to help shape the service</b>	Ad hoc surveys have been conducted in the past but there has not been a structured approach to how information gathered, and action taken on results.	<b>3.1 Staff feedback survey:</b> A staff survey will be commissioned to identify staff satisfaction across the protected characteristics. Staff will also be asked on their views as to whether they feel the company is achieving its objectives relating to equality, diversity and inclusion.	Nov 2023	Staff survey has been undertaken and actions identified from results have been implemented.
4	<b>Ensure staff have the knowledge and support they need to ensure that our goals related to equality, diversity and Inclusion are being fully implemented</b>	Staff receive training at induction and there is refresher training available	<b>4.1 Gap analysis and action to resolve:</b> Use the staff survey to help identify if there are any gaps in staff skills or knowledge which will require additional support or training to help resolve.	Nov 2023 and ongoing	Training and support has been given in those areas identified in staff survey.
<b>Theme 2 : Sustainable and diverse supply chains</b>					
5	<b>Ensure that we have a sustainable and</b>	Information not currently collated on the supply chain we use.	<b>5.1 Audit of supply chain:</b> An audit of existing suppliers will be carried out to	December 2023	Audit of supply chain carried out and results



	<b>diverse supply chain</b>		identify the characteristics of existing suppliers. This will be reported to the board to identify actions to ensure diversity in the supply chain.		reported to board.
		Prior to suppliers being accepted we require them to complete a checklist	<b>5.2 Supplier Criteria strengthened:</b> We will look to strengthen the checklist which suppliers are required to complete to encourage suppliers to reduce their environmental impact, including certification to independent environment accreditation schemes.	December 2023	Checklist has been revised and implemented
<b>Theme 3: Working together with Londoners</b>					
6	Ensure that we listen to the views of the Londoners who are our current or future tenants	Have undertaken ad hoc tenant surveys in the past	<b>6.1 Tenants Survey:</b> We have commissioned a tenancy survey to be undertaken in winter 2022/23 within this survey we will include questions to explore the views regarding our approach to diversity and inclusion and identify where this could be improved.	Sept 2023	Survey has been completed and results published.
		As above	<b>6.2 Make use of all research information:</b> We will make sure that we keep up to date with any research and surveys carried out which will highlight the views of Londoners, especially those that	On going	Have been able to reference surveys and research carried out to help shape the service we provide in line with the needs of Londoners.

			are under-represented or face housing related inequalities.		
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**Signed:**



**Date:** 3<sup>rd</sup> April 2023

**Name of Signatory:** Moses Hirschler, Chief Executive Officer

**Name of Organisation:** Cromwood Ltd